

**IN THE DISTRICT COURT IN AND FOR SEQUOYAH COUNTY  
STATE OF OKLAHOMA**

SEQUOYAH COUNTY, OKLAHOMA  
FILED  
IN DISTRICT COURT

**APR 06 2015**

CHERYL WILLIAMS,

Plaintiff,

vs.

ALAN CRAWFORD

Defendant.

Case No. CJ-15-51

VICKI BEATY, COURT CLERK

BY Wm DEPUTY

*Attorney Lien Claimed*

**ORIGINAL PETITION**

COMES NOW the Plaintiff and for her causes of action against the Defendant, allege and state as follows:

1. This case arises out of an automobile collision that occurred on April 28, 2013, in the County of Sequoyah, and State of Oklahoma.
2. On said date, the Defendant was driving southbound on County Road 4765 and crossed the centerline and collided into the Plaintiff who was driving northbound on County Road 4765.
3. The collision was caused by the negligence of the Defendant as follows:
  - A. He failed to maintain his vehicle in his own lane of travel;
  - B. He failed to maintain control of his vehicle
  - C. He was careless;
  - D. He failed to maintain a proper lookout;
  - E. He violated various city ordinances and Statutes of the State of Oklahoma; and
  - F. He was otherwise negligent as will be more fully set forth after discovery is completed.

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4. As a result of the negligence of the Defendant, Plaintiff suffered injuries and damages in excess of \$75,000.00 as follows:

- A. Past medical expenses;
- B. Future medical expenses;
- C. Past physical pain and suffering;
- D. Future physical pain and suffering;
- E. Past mental pain and suffering;
- F. Future mental pain and suffering;
- G. Past lost wages;
- H. Future lost wages;
- I. Loss of earning capacity
- J. Permanent impairment;
- K. Other damages to be more fully set forth after discovery is completed.

WHEREFORE, the Plaintiff prays for judgment against the Defendant for the injuries and damages set forth above, costs of suit herein incurred, interest and such other and further relief as the Court deems just and equitable.

Respectfully submitted,

CARR & CARR ATTORNEYS

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